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CHRISTOPHER R. ORAM, ESQ Nevada Bar No. 004349 520 South Fourth Street, Second Floor Las Vegas, Nevada 89101 3 (702) 384-5563 E-Mail: crorambusiness@aol.com 4 Attorney for Defendant FEDEL EZEKIEL SAKERS 5 UNITED STATES DISTRICT COURT DISTRICT OF NEVADA 6 7 * * * * UNITED STATES OF AMERICA, CASE NO. 2:16-cr-00279-JAD-PAL 8 Plaintiff, 9 VS. STIPULATION TO CONTINUE 10 **SENTENCING DATE** 11 FEDEL EZEKIEL SAKERS (First Request) 12 Defendants. 13

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by and through Robert Knief, Assistant United States Attorney, Fedel Sakers, by and through his attorney, Christopher R. Oram, that the Sentencing Hearing in the above-captioned matter, now scheduled for Monday, May 21, 2018, at the hour of 10:00 am, be vacated and rescheduled to a date and time convenient to the Court, but no earlier than June 18, 2018

This is the first request for a continuance of the Sentencing Hearing in this matter.

This Stipulation is entered into for the following reasons:

1. Counsel for Mr. Sakers is scheduled to be out of the country from April 20, 2018, through May 7, 2018. Given this, counsel has not had ample time to review the Presentence Investigation Report with Mr. Sakers nor has the undersigned had ample time to submit any objections to the Presentence Investigation Report. Given that ten business days are required by Parole and Probation to review any objections, and the undersigned does not return to the office until May 7, 2018, a continuance of the sentencing is necessary.

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2. The defendant is in	custody and doe	s not object to	this stipulation.

- 3. Denial of this request could result in a miscarriage of justice.
- 4. For all of the above-stated reasons, the ends of justice would best be served by a continuance of the Sentencing dates.

<u>/s/ Robert Knief 04/19/2018</u>	/s/ Christopher R. Oram 04/19/2018
ROBERT KNIEF DATE	CHRISTOPHER R. ORAM DATE
Assistant United States Attorney	Counsel for Defendant Sakers

Based upon the pending Stipulation of the parties, and good cause appearing therefore, the Court finds that:

- 1. The parties have stipulated to reschedule the sentencing date as presently scheduled.
- 2. This Court, being convinced that adequate showing has been made that were this request for a rescheduling of the dates to be denied, counsel would not have the necessary time to review the Presentence Investigation Report and submit any necessary objections based on the following:
 - A. Counsel for Mr. Sakers is scheduled to be out of the country from April 20, 2018, through May 7, 2018. Given this, counsel has not had ample time to review the Presentence Investigation Report with Mr. Sakers nor has the undersigned had ample time to submit any objections to the Presentence Investigation Report. Given that ten business days are required by Parole and Probation to review any objections, and the undersigned does not return to the office until May 7, 2018, a continuance of the sentencing is necessary.
 - B. The defendant is in custody and does not object to a continuance.
 - C. Denial of this request could result in a miscarriage of justice.
- D. For all of the above-stated reasons, the ends of justice would best be served by a rescheduling of the Sentencing date.

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ORDER

IT IS ORDERED that the Sentencing currently scheduled for May 21, 2018, at the hour of 10:00 am, be vacated and rescheduled to July 2, 2018, at the hour of 11:00 a.m.

DATED this 23rd day of April, 2018.

UNITED STATES DISTRICT JUDGE